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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:	:	
	:	
OTR MEDIA GROUP, INC.,	:	Chapter 11
	:	Case No. 1-11-47385 (ESS)
Debtor.	:	
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**JOINDER OF METROPOLITAN NATIONAL BANK IN OBJECTION OF THE
UNITED STATES TRUSTEE TO APPLICATIONS OF GOETZ FITZPATRICK LLP,
AS COUNSEL TO THE DEBTOR, AND NOVACK, BURNBAUM & CRYSTAL, LLP, AS
SPECIAL COUNSEL TO THE DEBTOR FOR INTERIM ALLOWANCE OF FEES FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES**

Metropolitan National Bank ("MNB"), by and through its counsel, Tannenbaum Helpern Syracuse & Hirschtritt LLP, files the following joinder (the "Joinder") to the Objection of the United States Trustee (ECF No. 523, the "Fee Objection") to the Applications of Goetz Fitzpatrick LLP, as Counsel to the Debtor, and Novack, Burnbaum & Crystal, LLP, as Special Counsel to the Debtor, for Interim Allowance of Fees for Services Rendered and Reimbursement of Expenses (ECF Nos. 507 and 508, the "Fee Applications"). In support of its Joinder, MNB respectfully states as follows:

I. BACKGROUND

1. MNB is the Debtor's senior and primary secured creditor.
2. MNB believes that rehabilitation of the Debtor's business is in the best interest of the Debtor and its creditors.
3. MNB has authorized the use of its cash collateral to fund the Debtor's operational expenses through the Chapter 11 case, including payment of its attorneys' fees.
4. MNB has previously opposed the motion of the United States Trustee to convert or dismiss the Debtor's case (ECF No. 154, the "Conversion Motion"; see Response of MNB to the US Trustee's Motion to Convert this Chapter 11 Case to Chapter 7 or, in the Alternative, Dismiss the Case, ECF No. 177) and as of this date remains opposed to having the case converted to one under Chapter 7.
5. Nevertheless, MNB agrees with the United States Trustee that the Court cannot properly evaluate the Fee Applications before deciding the United States Trustee's pending request to have the Debtor's case converted or dismissed.
6. MNB also maintains that denial of the Fee Applications without prejudice is particularly appropriate in light of the fact that the Debtor's cash on hand as of today, September 13, 2013, is only \$125,864.04.

II. JOINDER

7. In light of the foregoing and the facts and arguments presented in the Fee Objection, MNB hereby joins the United States Trustee in asking that the Court deny the Fee Applications without prejudice or, in the alternative, adjourn the Fee Applications to a date following the Court's final ruling on the Conversion Motion.

8. MNB reserves all rights to amend, supplement, withdraw, modify, or further set forth the arguments made in this Joinder with additional acts and/or information, as circumstances may warrant.

III. CONCLUSION

WHEREFORE, MNB respectfully requests that the Court: (i) deny the Fee Applications without prejudice or, in the alternative, adjourn the Fee Applications to a date following the Court's final ruling on the Conversion Motion; and (ii) grant such other and further relief as the Court deems just and proper.

Dated: September 13, 2013
New York, New York

By: /s/ Wayne H. Davis
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